

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

**United States District Court
Southern District Of Texas
FILED**

JUL 03 2019

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

**HECTOR ABEL GUERRA
JULIO CESAR ESCAMILLA**

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Criminal No.

M-19-1197

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about November 16, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**HECTOR ABEL GUERRA
and
JULIO CESAR ESCAMILLA**

in connection with the acquisition of a firearm, namely a Century Arms, Model RAS47, 7.62 x 39 mm rifle from Deez Guns, in McAllen, Texas, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made, and aided and abetted the making of, a false and fictitious written statement to Deez Guns which statement was intended and likely to deceive Deez Guns, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under Chapter 44 of Title 18, United States Code, in that the defendant HECTOR ABEL GUERRA falsely represented on the ATF form 4473, that he was the actual buyer of the firearm described above, when in truth and fact HECTOR ABEL GUERRA knew that those statements and representations were false and that JULIO CESAR ESCAMILLA was the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and Section 2.

Count Two

On or about December 1, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JULIO CESAR ESCAMILLA

knowingly made a false statement and representation in the records of Deez Guns, a federal firearms licensee licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Deez Guns, in that the defendant did execute and certify an ATF form 4473, Firearms Transaction Record, to the effect that he was transferring one (1) Century Arms, Model RAS47, 7.62 x 39 mm pistol to Juan Carlos Castro, Jr., whereas in truth and in fact, Juan Carlos Castro, Jr., did not purchase nor receive the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

Count Three

On or about November 13, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JULIO CESAR ESCAMILLA

knowingly made a false statement and representation in the records of Deez Guns, a federal firearms licensee licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Deez Guns, in that the defendant did execute and certify an ATF form 4473, Firearms Transaction Record, to the effect that he was transferring one (1) Century Arms, Model RAS47, 7.62 x 39 mm rifle to Daniel Jose Cossio Flores, whereas in truth and in fact, Daniel Jose Cossio Flores, did not purchase nor receive the firearm.

In violation of Title 18, United States Code; Sections 924(a)(1)(A) and 2.

Count Four

On or about April 25, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JULIO CESAR ESCAMILLA

knowingly made a false statement and representation in the records of Deez Guns, a federal firearms licensee licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Deez Guns, in that the defendant did execute and certify an ATF form 4473, Firearms Transaction Record, to the effect that he was transferring one (1) Colt, Model 1911, 38 super caliber pistol to Rocio Adriana Martinez, whereas in truth and in fact, Rocio Adriana Martinez, did not purchase nor receive the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

A TRUE BILL


FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY


ASSISTANT UNITED STATES ATTORNEY